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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

v.

Gloria Bush,

Defendant.

Case:5:21-cr-20272  
Judge: Levy, Judith E.  
MJ: Altman, Kimberly G.  
Filed: 04-21-2021 At 04:50 PM  
INDI USA V GLORIA BUSH (LG)

Violations:

18 U.S.C. § 111  
18 U.S.C. § 924(c)

**INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT ONE**

18 U.S.C. §§ 111(a)(1), (b) – Assault of a Federal Officer

On or about April 7, 2021, in the Eastern District of Michigan, defendant GLORIA BUSH, forcibly assaulted, opposed, impeded, intimidated, and interfered with officers and employees of the United States, to wit: five (5) Special Agents and one (1) Task Force Officer of the Drug Enforcement Administration, while engaged in the performance of their official duties, and while in the commission of said acts, used a deadly and dangerous weapon, specifically, a Smith & Wesson MP 40, .40 caliber pistol, bearing serial number NHV0257, in violation of Title 18, United States Code, Sections 111(a)(1) and 111(b).

**COUNT TWO**

18 U.S.C. § 924(c) – Use and Carry of Firearm During and in Relation to a Crime of Violence

On or about April 7, 2021, in the Eastern District of Michigan, defendant GLORIA BUSH knowingly discharged, carried, and used a firearm, that is, a Smith & Wesson MP 40, .40 caliber pistol, bearing serial number NHV0257, during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is: Assault of a Federal Officer (as more particularly described in Count One of this Indictment), in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii).

**FORFEITURE ALLEGATIONS**

(18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

1. The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461.

2. Upon being convicted of violating Title 18, United States Code, Sections 111(a)(1) and 111(b), and/or Title 18, United States Code, Section 924, as set forth in this Indictment, defendant GLORIA BUSH shall forfeit to the United States any firearms and ammunition involved in the offense(s), pursuant to Title 18, United States Code, Section 924(d)(1) together with Title 28, United States Code, Section 2461(c), including but not limited to a Smith & Wesson MP 40, .40

caliber pistol, bearing serial number NHV0257.

THIS IS A TRUE BILL

*s/Grand Jury Foreperson*

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GRAND JURY FOREPERSON

SAIMA S. MOHSIN

Acting United States Attorney

CRAIG WININGER

Chief, Violent and Organized Crime Unit

*s/ Ranya Elzein*

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RANYA ELZEIN

Assistant United States Attorney

Dated: April 21, 2021

United States District Court Eastern District of Michigan	Criminal Case Cover	Case: 5:21-cr-20272 Judge: Levy, Judith E. MJ: Altman, Kimberly G. Filed: 04-21-2021 At 04:50 PM INDI USA V GLORIA BUSH (LG)
NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately.		
<b>Companion Case Information</b>		<b>Companion Case Number:</b>
This may be a companion case based on LCrR 57.10(b)(4) <sup>1</sup> :		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		AUSA's Initials: <i>RE</i>

Case Title: USA v. Gloria BushCounty where offense occurred: Wayne *✓*Offense Type: FelonyIndictment -- Prior Complaint [Case No. 21-MJ-30169]**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

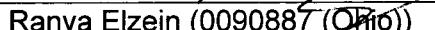
Reason:

Defendant NameChargesPrior Complaint (if applicable)

**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case**

April 21, 2021

Date



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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.